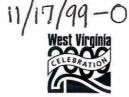


Office of Environmental Remediation 1356 Hansford Street Charleston, WV 25301 (304) 558-2745 (304) 558-3998 (fax)



West Virginia Division of Environmental Protection

Cecil H. Underwood Governor

Michael C. Castle Director

17 November 1999

Mrs. Dawn (Boucher) Hayes Atlantic Division NAVFACENGCOM Code 18234 1510 Gilbert Street Norfolk, VA 23511-2699

RE:

Allegany Ballistics Laboratory

Site 1 Groundwater Treatment Plant

Discharge

Dear Mrs. Hayes:

The Site 1 groundwater treatment system installed as a CERCLA action at Allegany Ballistics Laboratory (ABL) is discharging Ammonium Perchlorate (AP). This compound was not identified as a contaminant of potential concern and has not been approved for discharge by the West Virginia Division of Environmental Protection (WVDEP) Office of Water Resources (OWR).

Based on the most current discharge results, AP is entering the CERCLA groundwater treatment plant and discharging at the same level. As defined by §22-11 the West Virginia Water Pollution Control Act AP would be considered a pollutant. Discharge of a pollutant constitutes a violation of the Anti-Degradation Policy §46CSR1-4.

Within one hundred and eighty days, a methodology shall be implemented using best available technology to reduce or eliminate the AP from the effluent discharge from the Site 1 groundwater treatment plant. Within 45 days, identify the proposed treatment system modification for WVDEP concurrence. The proposal shall contain a list of available technologies and corresponding treatment limits. Failure to implement an action will result in the suspension of the Site 1 effluent discharge limits at the end of the one hundred and eighty days.



From this point forth, AP shall be included as one of the compounds monitored and reported on a monthly basis. The lowest method of detection shall be used when analyzing for this compound.

If there are any questions or if you require further clarification, please contact me at (304) 558-2745 or E-mail: tbass@mail.dep.state.wv.us.

Sincerely,

Thomas L. Bass

Environmental Resource Specialist Office of Environmental Remediation

Superfund Group

cc: Bruce Beach, EPA

John Aubert, NAVSEA Brett Doerr, CH2Mhill Lou Williams, NAVSEA Steve Hoffman, NAVSEA David McBride, NAVSEA John Fairbank, MDE